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UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

AMERICAN FEDERATION OF  
GOVERNMENT EMPLOYEES, AFL-CIO;  
AMERICAN FEDERATION OF STATE  
COUNTY AND MUNICIPAL EMPLOYEES,  
AFL-CIO; et al.,

Plaintiffs,

v.

UNITED STATES OFFICE OF PERSONNEL  
MANAGEMENT, et al.,

Defendants.

Case No. 3:25-cv-01780-WHA

**DECLARATION OF OSCAR ARBULU**

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I, Oscar Arbulu, hereby declare as follows:

1. I am the Deputy Political Director at Common Defense Civic Engagement. In that position, I manage a broad portfolio of issues and direct staff to mobilize veterans to support and advocate for policies that help veterans, military families, and all working families. I make this statement based on personal knowledge and if called as a witness could and would testify competently thereto.

2. Common Defense is a grassroots membership organization of progressive veterans, military families, and civilian supporters standing up for our communities against the rising tide of racism, hate, and violence. Common Defense invests in the leadership of its members through training and deployment in campaigns that connect directly to their history of service, including voting rights, climate justice, and anti-militarism.

3. Approximately 33,187 of Common Defense's members live in California, including approximately 2,000 veterans.

4. Military veterans comprise a large percentage of the federal workforce, and the mass termination of probationary employees across federal agencies thus has a disproportionate effect on military veterans. Many veterans have already been terminated from their jobs. And the recent firings—taken together with the prominent media reports documenting the thousands of probationary employees who have been fired as part of the unprecedented mass termination program—have created widespread fear and concern among those who are still employed in government positions.

5. Veterans, many of whom have service-related disabilities, rely on government agencies to provide the services that have been promised to them. Mass layoffs of probationary employees at those agencies, including at the VA, threaten disruption to these critical services.

6. As a result of these developments, Common Defense has had to devote considerable resources to responding to requests from our members and providing guidance about the mass probationary terminations. Many members believe that the termination of their employment may be imminent, and understandably have asked questions—by email, by phone, and on our members' slack channel—about what the letter means for their rights as employees. Responding to members

1 questions, and working to determine what answers we can give to those members, diverts resources  
2 from Common Defense’s advocacy mission and core priorities, including working to expand ballot  
3 access at the state level, advancing initiatives to address climate change, and training and educating  
4 members.

5 7. In response to these terminations, Common Defense has established an online  
6 platform designed for collecting the stories we have been hearing from our members about the  
7 multifaceted ways in which the cuts affect veterans, their families, and government workers. As of  
8 February 22, 2025, we have received more than 50 submissions, highlighting the physical, emotional,  
9 and financial burdens that our members and their families have endured.

10 8. One submission from a terminated probationary employee explained that her  
11 supervisor had not even been informed that she and two other members of her five-person team at the  
12 Department of Housing and Urban Development were being fired. Her team handled issues from  
13 members of the public who were dealing with eviction, homelessness, and buying a home, and those  
14 terminations slashed the team’s capacity to provide assistance. On a personal level, she explained  
15 that the termination meant “my partner and I can no longer buy our first home, which we were in the  
16 process of doing. Instead, we have to use our house savings to float ourselves until I find another job,  
17 and I have no idea how long that will take. ... The anxiety and stress of this situation is  
18 unbelievable.”

19 9. Members have also shared stories of the effects of potential cuts in services. As one  
20 member explained, “VA layoffs directly affect me as many areas of the VA are currently understaffed  
21 and wait times are already substantial for some services.”

22 10. Terminating probationary employees further strains already understaffed veterans’  
23 hospitals and other veterans’ services. This risk of severe disruption remains the case whether the  
24 service providers themselves are terminated or whether the terminations affect other employees, such  
25 as support staff. The loss of probationary administrative staff, for example, means that our members’  
26 phone calls are likely to go unanswered for longer periods of time, and there are likely to be delays in  
27 scheduling their vital medical appointments.  
28

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 23rd day of February 2025 in Davis, CA (city, state).

Declaration of Oscar Arbulu, No. 3:25-cv-01780-WHA